

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

The State Attorney General Litigation

**MDL 2724
16-MD-2724
HON. CYNTHIA M. RUFE**

Civil Action No. 17-3768

Declaration of Jeffrey A. Glazer

I, Jeffrey A. Glazer, declare as follows:

1. From March 2006 to August 26, 2016 I served as President and Chief Executive Officer of Heritage Pharma Holdings Inc. and its wholly owned subsidiary Heritage Pharmaceuticals Inc. (collectively ("Heritage")).
2. I served as Vice Chairman of Heritage from July 2014 through September 2015 and Chairman of Heritage from September 2015 to August 2016.
3. As President and CEO, I was responsible for Heritage's day-to-day operations.
4. In April 2011, Emcure Pharmaceuticals Limited ("Emcure"), an Indian company headquartered in Pune, India, acquired 100% of Heritage Holdings Inc. and Heritage became a wholly owned subsidiary of Emcure. For purposes of this declaration, I refer to the period from Emcure's acquisition of Heritage Pharma Holdings Inc. until August 26, 2016 as the relevant time period.

5. At the time of Emcure's acquisition of Heritage, Emcure operated in the United States through Emcure Pharmaceuticals USA, which became known as Heritage Pharma Labs Inc. ("Heritage Labs").
6. At some point in time, Heritage Labs became a wholly owned subsidiary of Heritage.
7. I was CEO of Heritage Labs from September 2014 through August 26, 2016 and served on its Board of Directors.
8. Heritage was the exclusive U.S. distributor for all non-third-party licensed or owned Emcure pharmaceutical products during the relevant time period.
9. Emcure and Heritage had common Board of Director members during the relevant time period. Mr. Satish Mehta was on both boards for the entire period. Mr. Marvin Samson was on both boards from July 2011 through June 2013.
10. Heritage's Board of Directors consisted, for a number of years, of me, Mr. Mehta, (chairman of the Board until my appointment as chairman in 2015), and Mr. Vik Thapar. Mr. Mehta remained on the Board after I was appointed chairman.
11. Mr. Mehta and Mr. Thapar were employed by Emcure and received Board of Director compensation from Heritage.
12. Emcure senior management and Heritage senior management conferred on key business decisions for Heritage related to business development, research and development, financial operations and supply chain management.
13. I regularly traveled to India as a part of my day- to-day operation of Heritage. Heritage's Board of Director meetings were regularly held in Pune, India and in

New Jersey. Some members of Emcure's senior management also regularly travelled to the U.S. to meet with me and others at Heritage.

14. I have testified on behalf of Emcure as a Federal Rules of Civil Procedure 30(b)(6) corporate representative, e.g. in *In Re Certain Zoledronic Acid Cases*, D. N.J. 12-cv-03967.

15. Heritage Labs or its predecessor Emcure USA, served as Emcure's U.S. agent for interactions with the US FDA.

I declare under penalty of perjury that the forgoing is true and accurate to the best of my knowledge.

Dated: July 25, 2019

By: 

Jeffrey A. Glazer